

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS
LIABILITY LITIGATION

MDL No. 2419
Dkt. No. 1:13-md-2419 (RWZ)

THIS DOCUMENT RELATES TO:

All Actions Naming The Specialty Surgery
Center, PLLC

**PLAINTIFFS' STEERING COMMITTEE'S MOTION FOR DISTRIBUTION OF
COMMON BENEFIT FEES AND EXPENSES RELATED TO SPECIALTY SURGERY
CENTER CASES**

The Plaintiffs' Steering Committee hereby seeks an order from this Court (i) approving an eight percent (8%) assessment from available funds from the Specialty Surgery Center Qualified Settlement Fund; (ii) approving the payment of reasonable expenses made in support of common benefit efforts as recommended by the PSC, and (iii) approving the allocation and payment of reasonable attorneys' fees to specified firms in amounts determined by the PSC to be reasonable and appropriate for common benefit efforts and in accordance with this Court's prior orders. The grounds therefore are set out in the accompanying memorandum filed herewith and the PSC's proposed allocation of this common benefit assessment is attached as Exhibit A to the contemporaneously filed memorandum of law in support of this Motion.

A proposed order granting this motion is also filed contemporaneously herewith, and attached hereto as Exhibit A.

Respectfully Submitted, this 8th day of March, 2018,

/s/ J. Gerard Stranch, IV

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Plaintiffs' Steering Committee

CERTIFICATE OF SERVICE

I, J. Gerard Stranch, IV, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: March 8, 2018

/s/ J. Gerard Stranch, IV
J. Gerard Stranch, IV